

2022 MISSOURI ATTORNEY GENERAL'S OPINIONS

MISSOURI ATTORNEY GENERAL'S OPINIONS

Opinion	Date	Topic	Summary
1-2022	Jan 19		
2-2022	Jan 19		
3-2022	Jan 19		
4-2022	Jan 19		
5-2022	Jan 19		
6-2022	Feb 7		
7-2022	Feb 14		
8-2022	Feb 22		
9-2022	Mar 2		
10-2022	Mar 11		
11-2022	Mar 29		
12-2022	Apr 12		
13-2022	Apr 28		
14-2022	May 17		
15-2022	June 10		
16-2022	June 10		
17-2022	June 22		
18-2022	June 22		
19-2022	June 23		
20-2022	June 23		
21-2022	June 23		
22-2022	June 24		
23-2022	Nov 30		
24-2022	Nov 30		
25-2022	Nov 30		
26-2022	Nov 30		
27-2022	Nov 30		
28-2022	Dec 16		
29-2022	Dec 16		
30-2022	Dec 16		
31-2022	Dec 16		
32-2022	Dec 16		
33-2022	Dec 16		
34-2022	Dec 22		
35-2022	Dec 22		
36-2022	Dec 22		
37-2022	Dec 22		
38-2022	Dec 28		

39-2022	Dec 28		
40-2022	Dec 28		
41-2022	Dec 28		
42-2022	Dec 28		
43-2022	Dec 30		
44-2022	Dec 30		
45-2022	Dec 30		
46-2022	Dec 30		
47-2022	Dec 30		
48-2022	Jan 6		
49-2022	Jan 6		
50-2022	Jan 6		
51-2022	Jan 6		
52-2022	Jan 6		
53-2022	Jan 6		
54-2022	Jan 9		
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59-2022	Jan 9		
60-2022	Jan 9		
61-2022	Jan 9		
62-2022	Jan 9		



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

January 19, 2022

OPINION LETTER NO. 1-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 7, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Austin Shaffer, 2022-080. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- clarify the Federal Government's duty to uphold the rights of Missouri Citizens under the United States Constitution including the Bill of Rights and all other provisions;
- identify breaches by the Federal Government; and
- allow the State of Missouri to become a "separate administrative region" of the state of Texas, while retaining its status as a state of the United States of America as the legislature and governor of this State may lawfully determine best?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

January 19, 2022

OPINION LETTER NO. 2-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 7, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Austin Shaffer, 2022-081. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- require votes to be counted by hand not by machines;
- require all ballots to be paper ballots;
- require a state-issued ID or driver license to vote;
- permit early voting no more than fourteen days prior to election;
- allow observers inside and outside polling stations to take pictures;
- allow the state General Assembly to adjust or void any vote totals it determines appropriate in presidential elections; and
- create the crime of treason against persons for voter fraud, failure to report results timely and certain poll worker actions?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A blue ink signature of Eric S. Schmitt is written over the typed name.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

January 19, 2022

OPINION LETTER NO. 3-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 7, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Austin Shaffer, 2022-082. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- establish parental rights for parents of minor children without obstruction or interference from the state, political subdivisions, governmental entities or any other institutions;
- allow parents to direct minor children's education and care including religious and moral upbringing;
- provide parents access and review all school records related to minor children; and
- allow parents to make health care decisions and access and review of medical records related to minor children unless prohibited by law or if the parent is the subject of an investigation of a crime committed against the minor child?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

January 19, 2022

OPINION LETTER NO. 4-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

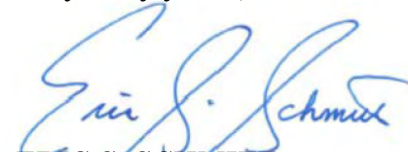
This opinion letter responds to your request dated January 7, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Austin Shaffer, 2022-083. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- prohibit any government or other private organization from mandating any vaccine or medication unless the vaccine or medication has been in existence and successfully tested for at least 20 years without significant modification; and
- require any vaccine provider without 20 years of existence and successful testing without modification and was not developed by use of inactivated toxins, or whole bacteria or vims, or part of them, and is not an RNA vaccine to establish a 20 year escrow account and escrow 75% of revenues for the purpose of paying medical claims?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

January 19, 2022

OPINION LETTER NO. 5-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 10, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by William Bolch, 2022-084.

We conclude that the petition must be rejected for at least the following reasons:

1. The petition is not in the form prescribed by § 116.040, RSMo.
2. Failure to comply with Section 116.050.2(2) by not copying the full and correct text of the measure in that it does not “Include all sections of existing law or of the constitution which would be repealed by the measure.”

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt".

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

February 7, 2022

OPINION LETTER NO. 6-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated January 24, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article VIII of the Missouri Constitution submitted by Connor Toth (2022-085).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

February 14, 2022

OPINION LETTER NO. 7-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:


This opinion letter responds to your request dated February 4, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Tohle Dumizo, 2022-086.

We conclude that the petition must be rejected for at least the following reasons:

1. The petition does not contain "all matter which is to be deleted included in its proper place enclosed in brackets and all new matter shown underlined" as required pursuant to § 116.050.2(1), RSMo.
2. The petition does not contain "all sections of existing law or of the constitution which would be repealed by the measure" as required pursuant to § 116.050.2(2), RSMo.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and "make a final decision as to the approval or rejection of the form of the petition."

Very truly yours,


ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

February 22, 2022

OPINION LETTER NO. 8-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of February 10, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Connor Toth, 22-085. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no savings, one-time costs of at least \$2.4 million, and ongoing costs of at least \$375,000 each primary election, \$311,000 each general election, and \$286,000 for all other elections.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

March 2, 2022

OPINION LETTER NO. 9-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated February 18, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Tohle Dumizo, 2022-087.

We conclude that the petition must be rejected for at least the following reasons:

1. The petition does not contain "all matter which is to be deleted included in its proper place enclosed in brackets and all new matter shown underlined" as required pursuant to § 116.050, RSMo.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and "make a final decision as to the approval or rejection of the form of the petition."

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

March 11, 2022

OPINION LETTER NO. 10-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 1, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Connor Toth, 2022-085. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- require all elections beginning in 2026 for local, state, and federal elected offices to utilize ranked choice voting;
- allow the number of choices a voter may rank to be no fewer than three per open seat;
- allow a political subdivision, special district, or county to opt out by ordinance or rule, by providing at least thirty days written notice to the election authority prior to candidate filing; and
- declare a candidate who receives a majority of votes to be certified the winner?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is written over the typed name.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

March 29, 2022

OPINION LETTER NO. 11-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated March 15, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition submitted by Tohle Dumizo, 2022-088.

We conclude that the petition must be rejected for at least the following reasons:

1. Failure to comply with Section 116.060, RSMo, due to not having the county of signature circulation located on the correct place on the signature sheet.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and "make a final decision as to the approval or rejection of the form of the petition."

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

April 12, 2022

OPINION LETTER NO. 12-2022

The Honorable Angela Mosley
201 W. Capitol Ave., Rm. 421
Jefferson City, Missouri 65101
(573) 751-2420

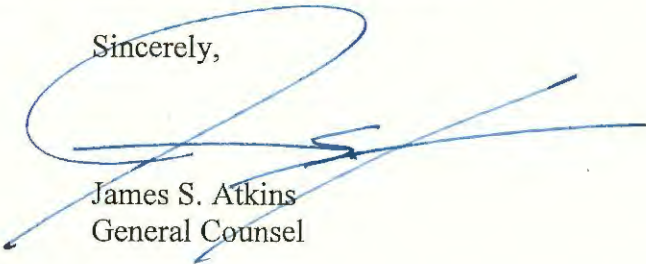
Re: Opinion Request – Effect of adoption of St. Louis County Proposition A on Incumbent non-merit Employees and 2022 Budget of St. Louis County

Dear Senator Mosley:

We have examined your request for an Attorney General's Opinion regarding the effect of proposition A on non-merit employees in St. Louis County.

Unfortunately, we must decline your request for this opinion. Section 27.040, RSMo, provides for the Attorney General to issue an opinion "to the general assembly, or to either house ... upon any question of law relative to their respective offices or the discharge of their duties." The questions at issue in your request are not related to the discharge of your duties, as required by § 27.040, RSMo. We recommend you consult with Senate legal counsel or legislative research staff on this matter.

Sincerely,



James S. Atkins
General Counsel



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

April 28, 2022

OPINION LETTER NO. 13-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated April 18, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article XV of the Missouri Constitution submitted by Tohle Dumizo (2022-089).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General

Supreme Court Building
207 W. High Street
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

OP-2022-013



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

May 17, 2022

OPINION LETTER NO. 14-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of May 6, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Tohle Dumizo (22-089). The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

June 10, 2022

OPINION LETTER NO. 15-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 1, 2022, for our review under § 116.025, RSMo, of a proposed fair ballot language statement for the initiative petition relating to Elections for state and Federal Officials, version 1 (2022-051). The proposed fair ballot language statement is as follows:

A "yes" vote will amend the Missouri Constitution to make primary elections for statewide office, Missouri General Assembly and United States Congress open elections in which all candidates appear on a single ballot.

The amendment would create a runoff between the top four candidates for each office selected at the primary election using ranked choice voting to determine the winner of the general election.

A "no" vote will not amend the Missouri Constitution and primary and general elections will remain unchanged.

If passed, this measure will have no impact on taxes.

Pursuant to § 116.025, RSMo, we approve the legal content and form of the proposed fair ballot language statement.

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207 W. High Street
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

Because our review of the fair ballot language statement is mandated by statute, no action we take with respect to such review should be construed as an endorsement of the initiative petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Eric S. Schmitt", is written over a faint, larger blue ink signature that is partially obscured.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

June 10, 2022

OPINION LETTER NO. 16-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 1, 2022, for our review under § 116.025, RSMo, of a proposed fair ballot language statement for the initiative petition relating to Marijuana Use and Expunging Cannabis-related Criminal Records (2022-059). The proposed fair ballot language statement is as follows:

A "yes" vote will amend the Missouri Constitution to remove state prohibitions on the purchase, possession, consumption, use, delivery, manufacture, and sale of marijuana for personal use for adults over the age of twenty-one.

The amendment would also allow individuals with certain marijuana-related offenses to petition for release from prison or parole and probation and have their records expunged: along with imposing a six percent tax on the retail price of recreational marijuana.

A "no" vote will not amend the Missouri Constitution and the sale and use of marijuana for recreational purposes will remain prohibited under current law. Medical marijuana would remain unchanged.

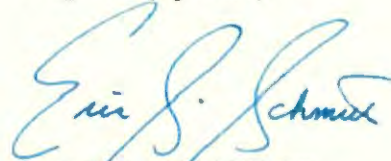
If passed, this measure will impose a 6 percent tax on the retail price of recreational marijuana.

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Fax: (573) 751-0774
www.ago.mo.gov

Pursuant to § 116.025, RSMo, we approve the legal content and form of the proposed fair ballot language statement.

Because our review of the fair ballot language statement is mandated by statute, no action we take with respect to such review should be construed as an endorsement of the initiative petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Eric S. Schmitt", is written over a faint, larger blue ink signature that is partially obscured.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

June 22, 2022

OPINION LETTER NO. 17-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of June 10 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition related to House Joint Resolution No. 116. The fiscal note summary that you submitted is as follows:

State governmental entities estimate no savings and ongoing costs of \$132,000 annually. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

June 22, 2022

OPINION LETTER NO. 18-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of June 10 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition related to Senate Substitute No. 2 for Senate Joint Resolution No. 38. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no additional costs or savings related to this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

June 23, 2022

OPINION LETTER NO. 19-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 7, 2022, for our review under § 116.025, RSMo, of a proposed fair ballot language for House Joint Resolution No. 116. The proposed fair ballot language statement is as follows:

A "yes" vote will amend the Missouri Constitution to create the Missouri Department of the National Guard as a new state agency, headed by an adjutant general appointed by and serving at the pleasure of the governor by and with the advice and consent of the senate.

A "no" vote will not amend the Missouri Constitution regarding the National Guard.

If passed, this measure will have no impact on taxes.

Pursuant to § 116.025, RSMo, we approve the legal content and form of the proposed fair ballot language statement.

Because our review of the fair ballot language statement is mandated by statute, no action we take with respect to such review should be construed as an endorsement of the initiative petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is written over a printed name and title.

ERIC S. SCHMITT

Attorney General

Supreme Court Building
207 W. High Street
P.O. Box 899
Jefferson City, MO 65102
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Fax: (573) 751-0774
www.ago.mo.gov

OP-2022-021



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

June 23, 2022

OPINION LETTER NO. 20-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 7, 2022, for our review under § 116.025, RSMo, of a proposed fair ballot language for Senate Substitute No. 2 for Senate Joint Resolution No. 38. The proposed fair ballot language statement is as follows:

A "yes" vote will amend the Missouri Constitution to allow the general assembly by law to increase the minimum funding for a police force established by the state board of police commissioners to ensure such police force has additional resources to serve its communities. Currently the only police force established by the state board of police commissioners is found in Kansas City, Missouri.

A "no" vote will not amend the Missouri Constitution regarding the funding for a police force established by the state board of police commissioners.

If passed, this measure will have no impact on taxes.

Pursuant to § 116.025, RSMo, we approve the legal content and form of the proposed fair ballot language statement.

Because our review of the fair ballot language statement is mandated by statute, no action we take with respect to such review should be construed as an endorsement of the initiative petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is written over a blue circular stamp that contains the text "ERIC S. SCHMITT" and "Attorney General".

ERIC S. SCHMITT
Attorney General

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OP-2022-022



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

June 23, 2022

OPINION LETTER NO. 21-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated June 7, 2022, for our review under § 116.025, RSMo, of a proposed fair ballot language for Constitutional Convention Question. The proposed fair ballot language statement is as follows:

A "yes" vote will require the governor to call an election of delegates to serve at a convention for the purpose of revising or amending the Missouri Constitution. Any revisions or amendments will then be put to a vote of the people for their consideration.

A "no" vote will mean no constitutional convention will be held.

If passed, this measure will have no impact on taxes.

Pursuant to § 116.025, RSMo, we approve the legal content and form of the proposed fair ballot language statement.

Because our review of the fair ballot language statement is mandated by statute, no action we take with respect to such review should be construed as an endorsement of the initiative petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

June 24, 2022

VIA EMAIL AND HAND DELIVERY

OPINION LETTER NO. 22-2022

To: Revisor of Statutes
State Capitol Building
201 W. Capitol Avenue, Room 117A
Jefferson City, Missouri 65101-1556
(573) 751-4223
revision@lr.mo.gov

From: Eric S. Schmitt, Attorney General of Missouri

Re: **Immediate Efficacy of Section 188.017, RSMo**

Section 188.017, RSMo, known as the "Right to Life of the Unborn Child Act," prohibits abortion except in cases of medical emergency. The statute provides:

Notwithstanding any other provision of law to the contrary, no abortion shall be performed or induced upon a woman, except in cases of medical emergency. Any person who knowingly performs or induces an abortion of an unborn child in violation of this subsection shall be guilty of a class B felony, as well as subject to suspension or revocation of his or her professional license by his or her professional licensing board. A woman upon whom an abortion is performed or induced in violation of this subsection shall not be prosecuted for a conspiracy to violate the provisions of this subsection.

§ 188.017.2, RSMo. The statute further provides that "[i]t shall be an affirmative defense for any person alleged to have violated the provisions of subsection 2 of this section that the person performed or induced an abortion because of a medical emergency. The defendant shall have the burden of persuasion that the defense is more probably true than not." § 188.017.3, RSMo.

This law was passed with a contingent effective date. Section B of House Bill 126 (2019), which is codified at § 188.017.4, RSMo, provides as follows:

Supreme Court Building
207 W. High Street
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-3321
Fax: (573) 751-0774
www.ago.mo.gov

4. The enactment of this section shall only become effective upon notification to the revisor of statutes by an opinion by the attorney general of Missouri, a proclamation by the governor of Missouri, or the adoption of a concurrent resolution by the Missouri general assembly that:

(1) The United States Supreme Court has overruled, in whole or in part, *Roe v. Wade*, 410 U.S. 113 (1973), restoring or granting to the state of Missouri the authority to regulate abortion to the extent set forth in this section, and that as a result, it is reasonably probable that this section would be upheld by the court as constitutional;

(2) An amendment to the Constitution of the United States has been adopted that has the effect of restoring or granting to the state of Missouri the authority to regulate abortion to the extent set forth in this section; or

(3) The United States Congress has enacted a law that has the effect of restoring or granting to the state of Missouri the authority to regulate abortion to the extent set forth in this section.

§ 188.017.4, RSMo.

By issuing this Attorney General Opinion and providing it directly to you, I hereby provide notification to the Revisor of Statutes, pursuant to § 188.017.4(1), that the United States Supreme Court has overruled, in whole or in part, *Roe v. Wade*, 410 U.S. 113 (1973), restoring or granting to the state of Missouri the authority to regulate abortion to the extent set forth in § 188.017, RSMo, and that as a result, it is reasonably probable that § 188.017 would be upheld by the court as constitutional.

The Supreme Court's then-controlling plurality opinion in *Planned Parenthood of Southeastern Pennsylvania v. Casey*, 505 U.S. 833 (1992), stated that the "central holding" of *Roe v. Wade*, 410 U.S. 113 (1973), was "that viability marks the earliest point at which the State's interest in fetal life is constitutionally adequate to justify a legislative ban on nontherapeutic abortions." *Casey*, 505 U.S. at 860. *Casey* described this statement as *Roe*'s "central holding," "central principle," and/or "essential holding," at least nine times. *Id.* at 860, 861, 864, 865, 870, 871, 873, 879. *Casey* stated that it was declining to overrule that "central holding" of *Roe v. Wade*. But today, in *Dobbs v. Jackson Women's Health Organization*, No. 19-1392 (U.S.), the Supreme Court has overruled both *Roe* and *Casey*.

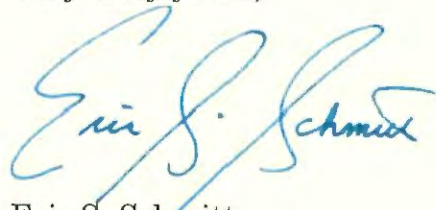
I therefore conclude that "[t]he United States Supreme Court has overruled, in whole or in part, *Roe v. Wade*, 410 U.S. 113 (1973)," and in doing so, the Supreme Court has "restor[ed] or grant[ed] to the state of Missouri the authority to regulate abortion to the extent set forth in this section." § 188.017.4(1), RSMo. I further conclude that, "as a result, it is reasonably probable that [§ 188.017, RSMo] would be upheld by the [U.S. Supreme Court] as constitutional." *Id.* *Dobbs* has overruled and fatally undermined both *Roe* and *Casey*. There is no jurisprudential basis for any further application of those defunct precedents.

This opinion immediately restores Missouri's deeply rooted history and proud tradition of respecting, protecting, and promoting the life of the unborn. Missouri has been a national leader in the pro-life movement, and this leadership is reflected in its laws. Missouri was among the first States to comprehensively prohibit abortion in 1825, and respect for the life of the unborn has been consistently reflected in its statutes for the past 200 years. Just a few months before *Roe v. Wade* was decided, the Supreme Court of Missouri upheld Missouri's statute prohibiting abortion, and it stated that "unborn children have all the qualities and attributes of adult human persons differing only in age or maturity. Medically, human life is a continuum from conception to death." *Rodgers v. Danforth*, 486 S.W.2d 258, 259 (Mo. banc 1972). This decision reaffirmed the Supreme Court of Missouri's previous decisions, which had long recognized that "[b]iologically speaking, the life of a human being begins at the moment of conception in the mother's womb," and that "[f]rom the viewpoint of the civil law and the law of property," an unborn child "is not only regarded as human being, but as such from the moment of conception—which it is in fact." *Steggall v. Morris*, 258 S.W.2d 577, 579 (Mo. banc 1953).

Even after *Roe* was decided, Missouri's laws continued to provide the highest possible level of protection to the unborn. Among many other examples, Section 1.205, enacted in 1986, provides that: "(1) The life of each human being begins at conception; (2) Unborn children have protectable interests in life, health, and well-being; [and] (3) The natural parents of unborn children have protectable interests in the life, health, and well-being of their unborn child." § 1.205.1, RSMo. It also provides that "the laws of this state shall be interpreted and construed to acknowledge on behalf of the unborn child at every stage of development, all the rights, privileges, and immunities available to other persons, citizens, and residents of this state." § 1.205.2, RSMo. Section 188.010, enacted in 2019, provides: "In recognition that Almighty God is the author of life, that all men and women are 'endowed by their Creator with certain unalienable Rights, that among these are Life,' and that Article I, Section 2 of the Constitution of Missouri provides that all persons have a natural right to life, it is the intention of the general assembly of the state of Missouri to: (1) Defend the right to life of all humans, born and unborn; (2) Declare that the state and all of its political subdivisions are a 'sanctuary of life' that protects pregnant women and their unborn children; and (3) Regulate abortion to the full extent permitted by the Constitution of the United States, decisions of the United States Supreme Court, and federal statutes." § 188.010, RSMo.

Today, the overruling of *Roe* and *Casey* permits Missouri to renew its proud pro-life traditions and restore basic legal protection for the most fundamental of human rights—the right to life.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt". The signature is fluid and cursive, with the first name "Eric" and last name "Schmitt" clearly legible, and "S." in the middle.

Eric S. Schmitt
Attorney General of Missouri



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

November 30, 2022

OPINION LETTER NO. 23-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 17, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article III, Section 50 of the Missouri Constitution submitted by Winston Apple (2024-001).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink that reads "Eric S. Schmitt".

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

November 30, 2022

OPINION LETTER NO. 24-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 17, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article III, version 1 of the Missouri Constitution submitted by Winston Apple (2024-002).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink that reads "Eric S. Schmitt".

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

November 30, 2022

OPINION LETTER NO. 25-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 17, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article III, version 2 of the Missouri Constitution submitted by Winston Apple (2024-003).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink that reads "Eric S. Schmitt".

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

November 30, 2022

OPINION LETTER NO. 26-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 17, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article III, version 3 of the Missouri Constitution submitted by Winston Apple (2024-004).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

November 30, 2022

OPINION LETTER NO. 27-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated November 17, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article III, version 4 of the Missouri Constitution submitted by Winston Apple (2024-005).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink that reads "Eric S. Schmitt".

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 16, 2022

OPINION LETTER NO. 28-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 5, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article III, Section 39 of the Missouri Constitution submitted by Winston Apple (2024-006).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink that reads "Eric S. Schmitt".

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 16, 2022

OPINION LETTER NO. 29-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 5, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article III, Section 52 of the Missouri Constitution submitted by Winston Apple (2024-007).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink that reads "Eric S. Schmitt".

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 16, 2022

OPINION LETTER NO. 30-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 5, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article VIII of the Missouri Constitution submitted by Winston Apple (2024-008).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 16, 2022

OPINION LETTER NO. 31-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 5, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapters 130 & 143, Revised Statutes of Missouri, submitted by Winston Apple (2024-009).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink that reads "Eric S. Schmitt".

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 16, 2022

OPINION LETTER NO. 32-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 5, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 192, Revised Statutes of Missouri, submitted by Winston Apple (2024-010).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 16, 2022

OPINION LETTER NO. 33-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 5, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 286 & 143, Revised Statutes of Missouri, submitted by Winston Apple (2024-011).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 22, 2022

OPINION LETTER NO. 34-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 12, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article VIII of the Missouri Constitution submitted by Winston Apple (2024-012).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 22, 2022

OPINION LETTER NO. 35-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 15, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article VIII of the Missouri Constitution submitted by David Roland (2024-013).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 22, 2022

OPINION LETTER NO. 36-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 15, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article VIII of the Missouri Constitution submitted by David Roland (2024-014).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 22, 2022

OPINION LETTER NO. 37-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 15, 2022, for our review under § 116.332, RSMo, of the sufficiency as to form of an initiative petition to amend Article VIII of the Missouri Constitution submitted by David Roland (2024-015).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is written over a faint, larger version of the same signature.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 28, 2022

OPINION LETTER NO. 38-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of December 7, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-001. The fiscal note summary that you submitted is as follows:

State governmental entities estimate initial costs of \$500,000 and ongoing costs of \$100,000 annually. Local governmental entities estimate ongoing cost of at least \$95,000 every general election year.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 28, 2022

OPINION LETTER NO. 39-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of December 7, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-002. The fiscal note summary that you submitted is as follows:

State governmental entities estimate initial costs of \$500,000 and ongoing costs of at least \$100,000 annually. Local governmental entities estimate initial cost of at least \$300,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 28, 2022

OPINION LETTER NO. 40-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of December 7, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-003. The fiscal note summary that you submitted is as follows:

State governmental entities estimate initial costs of \$500,000 and ongoing costs of at least \$100,000 annually. Local governmental entities estimate initial cost of at least \$300,000.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 28, 2022

OPINION LETTER NO. 41-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of December 7, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-004. The fiscal note summary that you submitted is as follows:

State governmental entities estimate initial costs of \$500,000 and ongoing costs of at least \$100,000 annually. Local governmental entities estimate initial cost of at least \$570,000, ongoing costs of at least \$240,000 annually, and ongoing savings of at least at \$500 annually and \$5,000 every general election year.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 28, 2022

OPINION LETTER NO. 42-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of December 7, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 2024-005. The fiscal note summary that you submitted is as follows:

State governmental entities estimate initial costs of \$500,000, ongoing costs of at least \$100,000 annually, and savings of \$13 million annually. Local governmental entities estimate initial cost of at least \$570,000, ongoing costs of at least \$240,000 annually, and ongoing savings of at least \$5,000 every general election year.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 30, 2022

OPINION LETTER NO. 43-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

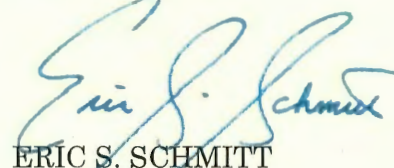
This opinion letter responds to your request dated December 21, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-001. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow initiative petitions to be signed electronically with statements of support by eligible voters;
- require the governor to establish and maintain a system for electronically filing statements of support; and
- require the Secretary of State to create a form for electronic statements of support and make such statements publicly available?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,



ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 30, 2022

OPINION LETTER NO. 44-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 21, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-002. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for members of the General Assembly to acquire proxies from each eligible Missouri voter to vote on all matters;
- require the governor to establish, maintain, and ensure the security and privacy of an online system for voters to facilitate electronically assigning and reassigning of proxies;
- require the secretary of state to create a proxy form by January 2, 2025; and
- require the General Assembly to pass legislation providing penalties for proxy malfeasance?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 30, 2022

OPINION LETTER NO. 45-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 21, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-003. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow for members of the General Assembly to acquire proxies from each eligible Missouri voter to vote on all
- matters;
- require the governor to establish, maintain, and ensure the security and privacy of an online system for voters to facilitate electronically assigning and reassigning of proxies;
- require the secretary of state to create a proxy form to allow for the assigning of proxies;
- allow a simple majority of votes instead of two-thirds to override a gubernatorial veto?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is positioned above the printed name of the Attorney General.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 30, 2022

OPINION LETTER NO. 46-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 21, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-004. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- allow members of the general assembly to acquire proxies from eligible Missouri voters to vote on all matters; require the governor to establish, maintain, and ensure the security and privacy of an online system for voters to facilitate electronically assigning and reassigning of proxies;
- allow a simple majority of votes instead of two-thirds to override a gubernatorial veto;
- require the general assembly to pass legislation providing penalties for proxy malfeasance; and
- elect members of the general assembly on November 3, 2026 based on assignment of the most proxies per district?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is written over a faint, larger version of the same signature.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI
ERIC SCHMITT

December 30, 2022

OPINION LETTER NO. 47-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 21, 2022 for our review under § 116.334, RSMo of a proposed summary statement prepared for the petition submitted by Winston Apple, 2024-005. The proposed summary statement is as follows:

Do you want to amend the Missouri Constitution to:

- progressively reduce the members of the general assembly to one hundred by the year 2027 and be a unicameral legislature;
- allow members of the general assembly to acquire proxies from eligible Missouri voters to vote on all matters;
- require the governor to establish, maintain, and ensure the security and privacy of an online system for voters to facilitate electronically assigning and reassigning of proxies;
- require the General Assembly to pass legislation providing penalties for proxy malfeasance; and
- allow a simple majority of votes instead of two-thirds to override a gubernatorial veto?

Pursuant to § 116.334, RSMo, we approve the legal content and form of the proposed statement. Because our review of the statement is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition, nor as the expression of any view regarding the objectives of its proponents.

Very truly yours,

A handwritten signature in blue ink, reading "Eric S. Schmitt", is written over a printed name.

ERIC S. SCHMITT
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 6, 2023

OPINION LETTER NO. 48-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101


Dear Auditor Galloway:

This office received your letter of December 28, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 24-006. The fiscal note summary that you submitted is as follows:

State governmental entities estimate costs of \$0 to \$50,000 annually from this proposal. Local governmental entities estimate no costs or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 6, 2023

OPINION LETTER NO. 49-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

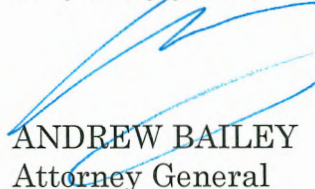
Dear Auditor Galloway:

This office received your letter of December 28, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 24-007. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no costs or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,

A blue ink signature of Andrew Bailey is written over a white rectangular background.

ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 6, 2023

OPINION LETTER NO. 50-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101


Dear Auditor Galloway:

This office received your letter of December 28, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 24-008. The fiscal note summary that you submitted is as follows:

State and local governmental entities estimate no savings, one-time costs of at least \$245,000 and ongoing costs of at least \$225,000 every general election year.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 6, 2023

OPINION LETTER NO. 51-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of December 28, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 24-009. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of about \$7,000. Also, an unknown amount of revenue will not be available for state General Revenue Fund spending. Local governmental entities estimate no costs or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 6, 2023

OPINION LETTER NO. 52-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

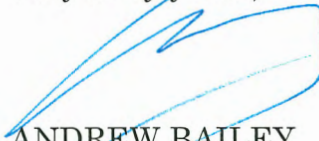
Dear Auditor Galloway:

This office received your letter of December 28, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 24-010. The fiscal note summary that you submitted is as follows:

State governmental entities expect any costs to equal any savings.
Local governmental entities expect no costs or savings from this proposal.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI

ANDREW BAILEY

January 6, 2023

OPINION LETTER NO. 53-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

Dear Auditor Galloway:

This office received your letter of December 28, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 24-011. The fiscal note summary that you submitted is as follows:

State governmental entities estimate initial costs of \$72,000, ongoing costs of at least \$548,000 annually, and ongoing revenues of \$839 million annually. Local governmental entities estimate no costs or savings.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 54-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

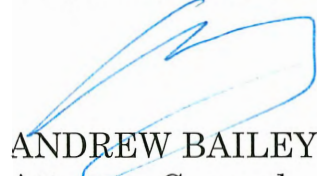
Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 29, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 29, Revised Statutes of Missouri, submitted by Terrence Wise, 24-016.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 55-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

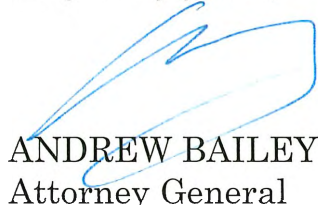
Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 29, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 29, Revised Statutes of Missouri, submitted by Terrence Wise, 24-017.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 56-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

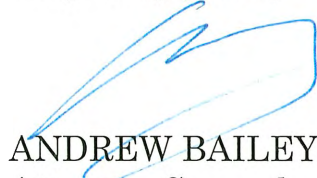
Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 29, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 29, Revised Statutes of Missouri, submitted by Terrence Wise, 24-018.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 57-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

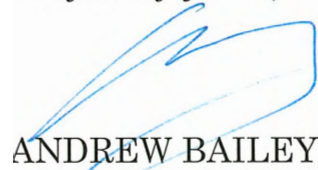
Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 29, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 29, Revised Statutes of Missouri, submitted by Terrence Wise, 24-019.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 58-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

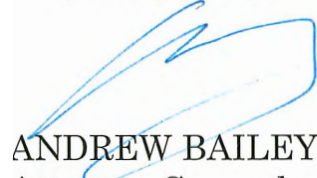
Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 29, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 29, Revised Statutes of Missouri, submitted by Terrence Wise, 24-020.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,



ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 59-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

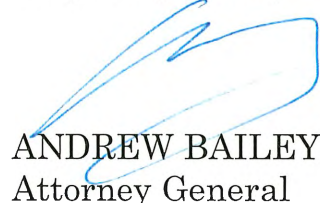
Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 29, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 29, Revised Statutes of Missouri, submitted by Terrence Wise, 24-021.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

A blue ink signature of Andrew Bailey is written over the name and title.

ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 60-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 29, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 29, Revised Statutes of Missouri, submitted by Terrence Wise, 24-022.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 61-2022

The Honorable John R. Ashcroft
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Ashcroft:

This opinion letter responds to your request dated December 29, 2022 for our review under § 116.332, RSMo of the sufficiency as to form of an initiative petition to amend Chapter 29, Revised Statutes of Missouri, submitted by Terrence Wise, 24-023.

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,


ANDREW BAILEY
Attorney General



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

January 9, 2023

OPINION LETTER NO. 62-2022

The Honorable Nicole Galloway
Missouri State Auditor
State Capitol, Room 121
Jefferson City, MO 65101

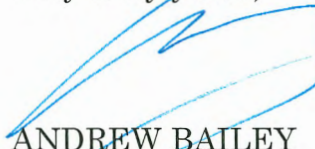
Dear Auditor Galloway:

This office received your letter of December 30, 2022, submitting a fiscal note and fiscal note summary prepared under § 116.175, RSMo, for an initiative petition submitted by Winston Apple, 24-012. The fiscal note summary that you submitted is as follows:

State governmental entities estimate one-time costs of at least \$245,000, ongoing cost of at least \$332,000 every general election year, and possible savings of \$7 million every general election year.

Under § 116.175.4, RSMo, we approve the legal content and form of the fiscal note summary. Because our review of the fiscal note summary is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the initiative petition or as the expression of any view regarding the objectives of its proponents. Furthermore, our review under § 116.175.4 does not examine the fairness or sufficiency of the estimated fiscal impact.

Very truly yours,



ANDREW BAILEY
Attorney General